

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA**

LIGTEL COMMUNICATIONS, INC.,

Plaintiff,

v.

BAICELLS TECHNOLOGIES INC.;  
BAICELLS TECHNOLOGIES NORTH AMERICA  
INC.,

Defendants.

Case No. 1:20-cv-00037

**MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff LigTel Communications, Inc. respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 65(a) and Local Rule 65-1(a), for immediate injunctive relief to prevent ongoing violations of the Lanham Act, federal trade secrets law, and Indiana state law by Defendants BaiCells Technologies Inc. and BaiCells Technologies North America Inc. (collectively, “BaiCells”). BaiCells is persistently holding itself out as LigTel by using LigTel’s Home Network Identity number, which identifies the origin of a wireless communication signal, without authorization. BaiCells has also misappropriated and threatened to misappropriate LigTel’s trade secrets. LigTel is simultaneously filing a memorandum of law supporting this motion.

Dated: January 21, 2020

Respectfully submitted,

/s/ Michael J. Nelson

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*Attorneys for Plaintiff LigTel Communications,  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2020, I caused the foregoing document to be filed electronically with the Clerk of the Court using the CM/ECF system, and sent a copy of the foregoing document to the following defendants at the following addresses:

BaiCells Technologies Inc.  
c/o Registered Agent Solutions, Inc.  
9 E. Loockerman Street, Suite 311  
Dover, DE 19901

BaiCells Technologies North America Inc.  
c/o Registered Agent Solutions, Inc.  
1701 Directors Blvd., Suite 300  
Austin, TX 78744

DATED: January 21, 2020

/s/ *Gabriel K. Gillett*